INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

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100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

September 24, 2003

TO: Interested Parties / Applicant

RE: Rescar Industries / 027-17130-00006

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

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Governor

Lori F. Kaplan
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www.state.in.us/idem

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Rescar Industries, Inc.
1723 West Walnut Street
Washington, Indiana 47501

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T027-7723-00006	
Issued by: Original Signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: August 20, 2001 Expiration Date: August 20, 2006

First Significant Permit Modification No.: 027-17130-00006	Affected Pages: 5-7, 29, 32-39, 43-45
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: September 24, 3003

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1, A.3 and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary railcar manufacturing and maintenance facility.

Responsible Official:	Director, Safety & Environmental
Source Address:	1723 West Walnut Street, Washington, Indiana 47501
Mailing Address:	1723 West Walnut Street, Washington, Indiana 47501
General Source Phone Number:	(812) 254-1121
SIC Code:	4789
County Location:	Daviess
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This railcar manufacturing and maintenance company consists of three (3) plants:

(a) Plant 1, the abrasive blasting building, is located at 1723 West Walnut Street, Washington, Indiana; and

(b) Plant 2, the paint and stencil building, is located at 1723 West Walnut Street, Washington, Indiana.

(c) Plant 3, the railcar cleaning building, is located at 1723 West Walnut Street, Washington, Indiana.

Since the three (3) plants are located on contiguous properties, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this Part 70 permit In this case, the word plant refers to separate buildings located at the same address.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) A railcar sandblasting facility constructed in 1991 capable of processing six (6) railcars per day located in an enclosed building, with a baghouse as control, exhausting to one stack.

(b) A railcar painting facility constructed in two phases; whereas, phase one commenced in 1973 and phase two commenced in 1993, with a maximum capacity of six (6) railcars per day, consisting of;

(1) A paint shop with three (3) pumps and three (3) spray guns exhausting to six (6) exhaust fans identified as [P-01, P-02, P-03, P-04, P-05, P-06], each equipped with dry fiber filters as control; and

(2) A railcar stencil process constructed in 1993 with a maximum capacity of twenty-four (24) railcars per day, consisting of four (4) spray guns exhausting to four (4) exhaust fans identified as [S-07, S-08, S-09, S-10], each equipped with dry fiber filters as control.

(c) A welding operation consisting of one (1) submerged arc station with a maximum hourly consumption of sixty (60) pounds of wire; twenty-two (22) metal inert gas stations with a maximum hourly consumption of fifty (50) pounds of wire per station; forty-eight (48) stick welding stations with a maximum hourly capacity of seventy-five (75), one ounce electrodes per station; and forty-eight oxymethane flame-cutting stations with a maximum metal cutting rate of twenty (20) inches per minute.

(d) One (1) railcar cleaning facility, constructed in 2003 and located at Plant 3, consisting of the following:

(1) Two (2) degassing operations, identified as DG-01 and DG-02, used to remove the flammable commodities in the railcars, each with a maximum process rate of 2 railcars per day, controlled by a 15 MMBtu/hr natural gas-piloted flare (FL-01), and exhausting through stack FL-01.

(2) Four (4) general cleaning spots, identified as CL-01, CL-02, CL-03, and CL-04, with a total maximum process rate of 10 railcars per day, exhausting through vent CV-01. The emissions may be controlled by one of the following control devices:

(A) For VOC containing commodities, controlled by one (1) carbon adsorption system, identified as CC-01, exhausting through stack CC-01.

(B) For water soluble commodities, controlled by one (1) enclosed scrubbing system, identified as SC-01. The scrubbing water is directed to one (1) enclosed loop cleaning system, which consists of two (2) 4,000 gallon water tanks and is controlled by adsorption system CC-01.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour [326 IAC 6-2-4]:

(1) Two (2) natural gas fired boilers, constructed after 1983, each with a maximum heat input capacity of 8.76 MMBtu/hr.

(2) One (1) natural gas fired boiler, identified as BO-01 and constructed in 2003, with a maximum heat input capacity of 7.0 MMBtu/hr, providing steam to cleaning operation and drying operation, and exhausting through stack BO-01.

(b) Asbestos abatement projects regulated by 326 IAC 14-10.

(c) A sand storage silo constructed in 1985 with a maximum capacity of 55 tons of sand and a maximum throughput of 15,685 tons of sand per year with a filter bag as emission control regulated by 326 IAC 6-3.

(d) Other emission units, not regulated by a NESHAP, with PM10 and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less

than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

(1) One (1) dig-out operation, identified as DO-01, used to remove the solid material in the railcars, with a maximum process rate of 5,000 pounds of material per hour, exhausting through vent CV-02. [326 IAC 6-3-2]

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22).

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)][326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard

Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ,. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
Southwest Regional Office Telephone Number: 812-436-2570
Southwest Regional Office Facsimile Number: 812-436-2572

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ,by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this

permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superceded by this permit.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a):

For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]
A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute, rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3][40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Pressure Gauge Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.

(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied;

(3) An automatic measurement was taken when the process was not operating;

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter.

Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) A railcar sandblasting facility constructed in 1991 capable of processing six (6) railcars per day located in an enclosed building with a baghouse as control, exhausting to one stack.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the sandblasting facility shall not exceed 6.06 pounds per hour when operating at a process weight rate of 1.79 tons per hour. The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.3 Particulate Matter (PM)

In order to comply with D.1.1, the baghouse for PM control shall be in operation and control emissions from the sandblasting facility at all times that the sandblasting facility is in operation.

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM and PM-10 testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Section C-Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the sandblasting, at least once per shift when the sandblasting is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 2.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the sandblasting when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

(a) To document compliance with Condition D.1.5, the Permittee shall maintain the following:

(1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle operation.

(2) Documentation of the dates vents are redirected.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6 and the dates the vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(b) A railcar painting facility constructed in two phases; whereas, phase one commenced in 1973 and phase two commenced in 1993, with a maximum capacity of six (6) railcars per day, consisting of:

(1) A paint shop with three (3) pumps and three (3) spray guns exhausting to six (6) exhaust fans identified as [P-01, P-02, P-03, P-04, P-05, P-06], each equipped with dry fiber filters as control; and

(2) A railcar stencil process constructed in 1993 with a maximum capacity of twenty-four (24) railcars per day, consisting of four (4) spray guns exhausting to four (4) exhaust fans identified as [S-07, S-08, S-09, S-10], each equipped with dry fiber filters as control.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC)Limitations

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of a daily volume - weighted average of 3.5 pounds of VOC per gallon of coating excluding water or 4.3 pounds of VOC per gallon of clear coating excluding water, as delivered to the applicator for any calender day for air dried or forced warm air (less than 90EC or 194 EF) dried coatings.

Solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.2.2 PSD Minor Limit [326 IAC 2-2]

This facility shall use less than 236 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit, when combined with Condition D.5.2, is required to limit the potential to emit of VOC to less than 249 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the paint shop and the stencil process shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.2.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.2.6 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-1-2(a)(7), when volume weighted averaging of the coatings is used to determine compliance with the limitation set in condition D.2.1. This volume weighted average shall be determined by the following equation:

$$A = [\ 3\ (C\ x\ U) / 3\ U]$$

Where: A is the volume weighted average in pounds VOC per gallon
C is the VOC content of the coating in pounds VOC per gallon
and U is the usage rate of the coating in gallons per unit, hour, day or other unit of time

D.2.7 VOC Emissions

Compliance with Condition D.2.1 and D.2.2 shall be demonstrated within 30 days of the end of each day based on the total volatile organic compound usage for the most recent month.

D.2.8 Particulate Matter (PM)

Pursuant to CP-027-2069-00006 and in order to comply with D.2.3, issued on September 30, 1991, the dry filters for PM control shall be in operation at all times when the paint shop and the stencil process are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth exhaust fans identified as P-01, P-02, P-03, P-04, P-05, P-06 and S-07, S-08, S-09, S-10 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the exhaust fans and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1 and D.2.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each day;

(4) The cleanup solvent usage for each day;

(5) The total VOC usage for each day; and

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.2.8 and D.2.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)];

(c) A welding operation consisting of one (1) submerged arc station with a maximum hourly consumption of sixty (60) pounds of wire; twenty-two (22) metal inert gas stations with a maximum hourly consumption of fifty (50) pounds of wire per station; forty-eight (48) stick welding stations with a maximum hourly capacity of seventy-five (75), one ounce electrodes per station; and forty-eight oxymethane flame-cutting stations with a maximum metal cutting rate of twenty (20) inches per minute.

Insignificant Activities:

(c) A sand storage silo constructed in 1985 with a maximum capacity of 55 tons of sand and a maximum throughput of 15,685 tons of sand per year with a filter bag as emission control.

(d) Other emission units, not regulated by a NESHAP, with PM10 and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

(1) One (1) dig-out operation, identified as DO-01, used to remove the solid material in the railcars, with a maximum process rate of 5,000 pounds of material per hour, exhausting through vent CV-02. [326 IAC 6-3-2]

(The information describing the process contained in this facility description box is descriptive and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate [326 IAC 6-3]

(a) Particulate Emissions from the welding operations shall not exceed the pound per hour emission rate established as E in the following formula, for a process weight rate equal to or greater than 100 pounds per hour:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3 (Process Operations), particulate emissions from the sand storage silo shall not exceed 3.0 pounds per hour when operating at a process weight rate of 1,250 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(c) Pursuant to 326 IAC 6-3-2 (Manufacturing Processes), particulate emissions from the dig-out operation (DO-01) shall not exceed 7.58 pounds per hour when operating at a

process weight rate of 5,000 pounds per hour. This emission limit is calculated using the equation in (a) above.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Insignificant Activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour [326 IAC 6-2-4]:

(1) Two (2) natural gas fired boilers, constructed after 1983, each with a maximum heat input capacity of 8.76 MMBtu/hr.

(2) One (1) natural gas fired boiler, identified as BO-01 and constructed in 2003, with a maximum heat input capacity of 7.0 MMBtu/hr, providing steam to cleaning operation and drying operation, and exhausting through stack BO-01.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-2-4]

(a) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the two (2) 8.76 MMBtu per hour heat input boilers shall be limited to 0.62 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = emission rate limit (lbs/MMBtu)
Q = total source heat input capacity (MMBtu/hr)

(b) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the boiler BO-01 shall be limited to 0.47 pounds per MMBtu heat input.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(d) One (1) railcar cleaning facility, constructed in 2003 and located at Plant 3, consisting of the following:

(1) Two (2) degassing operations, identified as DG-01 and DG-02, used to remove the flammable commodities in the railcars, each with a maximum process rate of 2 railcars per day, controlled by a 15 MMBtu/hr natural gas-piloted flare (FL-01), and exhausting through stack FL-01.

(2) Four (4) general cleaning spots, identified as CL-01, CL-02, CL-03, and CL-04, with a total maximum process rate of 10 railcars per day, exhausting through vent CV-01. The emissions may be controlled by one of the following control devices:

(A) For VOC containing commodities, controlled by one (1) carbon adsorption system, identified as CC-01, exhausting through stack CC-01.

(B) For water soluble commodities, controlled by one (1) enclosed scrubbing system, identified as SC-01. The scrubbing water is directed to one (1) enclosed loop cleaning system, which consists of two (2) 4,000 gallon water tanks and is controlled by adsorption system CC-01.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 VOC Emissions [326 IAC 8-1-6] [326 IAC 2-2]

(a) Pursuant to 326 IAC 8-1-6 (BACT), the Permittee shall direct the exhausts from the railcars which have high VOC containing commodities (vapor pressure greater than 0.5 psi) to one of the following control devices.

(1) Flare FL-01 for the degassing operations (DG-01 and DG-02), for the flammable VOC commodities, which have flashpoints less than 140EF.

(2) Carbon adsorption system CC-01 for the cleaning spots (CL-01, CL-02, CL-03, and CL-04), for the non-flammable VOC commodities with vapor pressure greater than 0.5 psi.

(b) The railcar cleaning operations at the railcar cleaning facility shall be limited such that the total VOC emissions are to less than 13.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The monthly VOC emissions shall be determined by the following equation:

VOC Emissions

$$= \sum_{n} \{a \times \frac{P \times V \times MW}{R \times T} + b \times [CF \times S + RE] \times D\} \times (1 - Eff)$$

Where,

n = number of VOC containing railcars in cleaned each month in each category
a = 1 for P equal or less than 14.7 psi (1 atm)
0.05 for P greater than 14.7 psi
P = vapor pressure of the commodity in each railcar shown on MSDS (psi)
V = volume of each railcar (ft^3) (1 gallon = 0.1337 ft^3)
MW = molecular weight of each commodity
R = gas constant = 10.73 psi·ft^3/lb-mole·^oR
T = the temperature for the vapor pressure specified on MSDS (^oR)
b = 0 for P equal or less than 14.7 psi
1 for P greater than 14.7 psi
CF = clingage factor = 0.000315 gallons/ft^2 from AP-42
S = the inner surface area of the railcar (ft^2)
RE = residuals in the railcar = 5 gallons
D = liquid density (lb/gal)
Eff = control efficiency (%)

[note: This equation is provided by the source based on the automatic tracking system at this source.]

Combined with limits in the rest of the permit, these requirements ensure that VOC emissions from the entire source are limited to less than 250 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

D.5.2 HAP Emissions [326 IAC 2-4.1]

(a) The Permittee shall direct the exhausts from the railcars which have HAP containing commodities to one of the following control devices.

(1) Flare FL-01 for the degassing operations (DG-01 and DG-02), for the flammable commodities, which have flashpoints less than 140EF.

(2) Carbon adsorption system CC-01 for the cleaning spots (CL-01, CL-02, CL-03, and CL-04), for the non-flammable HAP commodities with vapor pressure greater than 0.5 psi.

(3) Scrubbing system SC-01 for the cleaning spots (CL-01, CL-02, CL-03, and CL-04), for the water soluble HAP commodities.

(b) The railcar cleaning operations at the railcar cleaning facility shall be limited such that total HAP emissions are less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The monthly total HAP emissions shall be determined by the equation in Condition D.5.1(b).

The requirements above ensure that HAPs emissions from the this railcar cleaning facility is less than 10 tons/yr for a single HAP and less than 25 tons/yr for any combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 (MACT) are not applicable.

D.5.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.5.4 VOC and HAPs Emissions

In order to demonstrate compliance with Condition D.5.1(a) and D.5.2(a), for each railcar serviced, the Permittee shall keep the material safety data sheets (MSDS) for each commodity, and identify where each railcar was cleaned and how emissions from the cleaning operation were controlled.

D.5.5 VOC and HAPs Emission Control

In order to comply with Conditions D.5.1(a) and D.5.3(a), the Permittee shall install, calibrate, maintain, and operate a heat sensing device, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.6 Visible Emissions Notations

(a) Visible emission notations of stack exhaust from flare FL-01 shall be performed once per shift during normal daylight operations when this unit is in operation. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.5.7 Flare Pilot Flame

In order to comply with Condition D.5.5, the Permittee shall monitor the presence of a flare pilot flame using a thermocouple or any other equivalent device to detect the presence of a flame when the degassing operations (DG-01 and DG-02) are in operation.

D.5.8 Carbon Adsorption System

The Permittee shall monitor the VOC breakthrough indicator of the carbon adsorption system (CC-01), at least once per shift when the carbon adsorption system is in operation. The Permittee shall replace the spent carbon canister as indicated.

D.5.9 Carbon Adsorption System Inspections

An inspection shall be performed each calendar quarter for the carbon adsorption system (CC-01) controlling the general cleaning spots (CL-01, CL-02, CL-03 and CL-04). Inspections required by this condition shall not be performed in consecutive months. Inspections are optional when venting to the indoors.

D.5.10 Failure Detection

In the event that the carbon adsorption system malfunction has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.

D.5.11 Scrubbing System Monitoring

The Permittee shall record the pH level of the scrubbing system (SC-01) at least once per shift when the scrubbing system is in operation. When for any one reading, the pH level is outside the normal range of pH value of 4.0 to 10.0, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pH value reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The pH level shall be determined with the use of disposable pH paper.

[Note: This scrubbing system is not a typical scrubber and consists of the wash tanks and the orbital wash system, which sprays water droplets throughout the inside of the railcars. Therefore, there is no corresponding pressure drop or flow rate monitoring requirements with this scrubbing system.]

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.12 Record Keeping Requirements

(a) To document compliance with Conditions D.5.1(a), D.5.2(a), and D.5.4, the Permittee shall maintain records of the following for each railcar serviced:

(1) The material safety data sheets (MSDS) for each commodity.

(2) The cleaning operations of each railcar processed and how emissions were controlled in these cleaning operations.

(b) To document compliance with Conditions D.5.1(b) and D.5.2(b), the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP emission limits established in conditions D.5.1(b) and D.5.2(b).

(1) The commodity of each railcar cleaned.

(2) The vapor pressure of each commodity.

(3) The volume of each railcar cleaned.

(4) The molecular weight of each commodity.

(5) The inner surface area of the railcar, for commodities with a vapor pressure greater than 14.7 psi.

(6) The density of the commodity, for commodities with a vapor pressure greater than 14.7 psi.

(7) The total VOC and HAP emissions for each month.

(8) The total VOC anc HAP emissions for each compliance period.

(c) To document compliance with Condition 5.6, the Permittee shall maintain the once per shift records of visible emission notation of the exhaust from flare FL-01, when flare FL-01 is in operation.

(d) To document compliance with Condition 5.8, the Permittee shall maintain the once per shift records of VOC breakthrough monitor for carbon adsorption system CC-01 and the records of the spent carbon canister replacement when the carbon adsorption system is in operation.

(e) To document compliance with Condition 5.9, the Permittee shall maintain records of the results of the inspections required under Condition D.5.9.

(f) To document compliance with Condition 5.11, the Permittee shall maintain the once per shift records of pH level for scrubbing system SC-01 when the scrubbing system is in operation.

(g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.5.1(b) and D.5.2(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Rescar Industries
Source Address: 1723 West Walnut Street, Washington, IN 47501
Mailing Address: 1723 West Walnut Street, Washington, IN 47501
Part 70 Permit No.: T027-7723-00006

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Rescar Industries
Source Address: 1723 West Walnut Street, Washington, IN 47501
Mailing Address: 1723 West Walnut Street, Washington, IN 47501
Part 70 Permit No.: T027-7723-00006

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- C The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency ? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency :
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Rescar Industries
Source Address: 1723 West Walnut Street, Washington, Indiana 47501
Mailing Address: 1723 West Walnut Street, Washington, Indiana 47501
Part 70 Permit No.: T027-7723-00006
Facility: Paint Facility
Parameter: VOC Usage
Limit: Input VOC usage less than 236 tons per 12 consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	VOC Usage (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

Form Completed by:_____

Title / Position:_____

Date:_____

Phone:_____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Source Modification Quarterly Report

Source Name: Rescar Industries
Source Address: 1723 West Walnut Street, Washington, Indiana 47501
Mailing Address: 1723 West Walnut Street, Washington, Indiana 47501
Source Modification No.: 027-16864-00006
Facility: Railcar Cleaning Facility
Parameter: VOC Emissions
Limit: Less than 13 tons per twelve (12) month period with compliance determined at the end of each month. VOC emissions are determined using the equation in Condition D.5.1(b).

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Source Modification Quarterly Report

Source Name: Rescar Industries
Source Address: 1723 West Walnut Street, Washington, Indiana 47501
Mailing Address: 1723 West Walnut Street, Washington, Indiana 47501
Source Modification No.: 027-16864-00006
Facility: Railcar Cleaning Facility
Parameter: Total HAP Emissions
Limit: Less than 10 tons per twelve (12) month period with compliance determined at the end of each month. HAP emissions are determined using the equation in Condition D.5.1(b).

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT

Source Name: Rescar Industries
Source Address: 1723 West Walnut Street, Washington, IN 47501
Mailing Address: 1723 West Walnut Street, Washington, IN 47501
Part 70 Permit No.: T027-7723-00006

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ________________________________

Title/Position: ________________________________

Date: ________________________________

Phone: ________________________________

Attach a signed certification to complete this report.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNTV-PMOD.doc 9/16/03

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Source Modification and a Part 70 Significant Permit Modification

Source Background and Description

Source Name:	Rescar Industries, Inc.
Source Location:	1723 West Walnut Street, Washington, Indiana 47501
County:	Daviess
SIC Code:	4789
Operation Permit No.:	T027-7723-00006
Operation Permit Issuance Date:	August 20, 2001
Significant Source Modification No.:	027-16864-00006
Significant Permit Modification No.:	027-17130-00006
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed a modification application from Rescar Industries, Inc., relating to the construction and operation of the following emission units and pollution control devices:

(d) One (1) railcar cleaning facility, constructed in 2003 and located at Plant 3, consisting of the following:

(1) Two (2) degassing operations, identified as DG-01 and DG-02, used to remove the flammable commodities in the railcars, each with a maximum process rate of 2 railcars per day, controlled by a 15 MMBtu/hr natural gas-piloted flare (FL-01), and exhausting through stack FL-01.

(2) Four (4) general cleaning spots, identified as CL-01, CL-02, CL-03, and CL-04, with a total maximum process rate of 10 railcars per day, exhausting through vent CV-01. The emissions may be controlled by one of the following control devices:

(A) For VOC containing commodities, controlled by one (1) carbon adsorption system, identified as CC-01, exhausting through stack CC-01.

(B) For water soluble commodities, controlled by one (1) enclosed scrubbing system, identified as SC-01. The scrubbing water is directed to one (1) enclosed loop cleaning system, which consists of two (2) 4,000 gallon water tanks and is controlled by adsorption system CC-01.

*(3) One (1) dig-out operation, identified as DO-01, used to remove the solid material in the railcars, with a maximum process rate of 5,000 pounds of material per hour, exhausting through vent CV-02.

*(4) One (1) natural gas fired boiler, identified as BO-01, with a maximum heat input capacity of 7.0 MMBtu/hr, providing steam to cleaning operation and drying operation, and exhausting through stack BO-01.

*Note: These units are insignificant activities as defined in 326 IAC 2-7-1(21).

History

On February 28, 2003, Rescar Industries, Inc. submitted an application to the OAQ requesting to add a railcar cleaning facility (Plant 3) to their exiting source. Rescar Industries, Inc. is an existing railcar manufacturing and maintenance facility. Their Part 70 permit (T027-7723-00006) was issued on August 20, 2001.

Source Definition

This source consists of three (3) plants:

(a) Plant 1, the abrasive blasting building, is located at 1723 West Walnut Street, Washington, Indiana;

(b) Plant 2, the paint and stencil building, is located at 1723 West Walnut Street, Washington, Indiana; and

(c) Plant 3, the proposed railcar cleaning facility, is located at 1723 West Walnut Street, Washington, Indiana.

Since the three (3) plants are located on contiguous properties, belong to the same industrial grouping, and under common control of the same entity, IDEM, OAQ has determined that these three (3) plants will be considered one (1) source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
FL-01	Flare	25	NA	NA	NA
CC-01	Carbon Adsorber	20	0.17	Unknown	Ambient
BO-01	Boiler	25	0.33	Unknown	Ambient

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and the Part 70 Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 28, 2003. Additional information was received on April 23, 2003, June 2, 2003, June 4, 2003, and June 11, 2003.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 4).

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	2.53
PM-10	2.39
SO_2	0.73
*VOC	623
*CO	26.9
NO_x	7.54

HAP's	Potential To Emit (tons/year)
*A single HAP	Greater than 10
TOTAL	Greater than 25

*Note: The railcars cleaned at this site could contain any of the Federal HAPs.

Justification for Modification

This modification is being performed through a Part 70 Significant Source Modification pursuant to 326 IAC 2-7-10.5(f)(4) as the potential to emit VOC is greater than 25 tons/yr, and pursuant to 326 IAC 2-7-10.5(f)(6) as the potential to emit HAPs is greater than 10 tons/yr for a single HAP and greater than 25 tons/yr for any combination of HAPs. The permit modification is being performed through a Part 70 Significant Permit Modification pursuant to 326 IAC 2-7-12(d) because this modification involves significant changes to existing monitoring, reporting, and record keeping requirements in the Title V permit.

County Attainment Status

The source is located in Daviess County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_x	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Daviess County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD) and 326 IAC 2-2.

(b) Daviess County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD) and 326 IAC 2-2.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	90.3
PM-10	90.3
SO_2	5.00
VOC	Less than 250
CO	5.00
NOx	5.00

(a) This existing source is a minor stationary source because none of the attainment regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more, and it is not in one (1) of the twenty-eight (28) listed source categories.

(b) These emissions are based on the Technical Support Document (TSD) for the source's Title V permit (T027-7723-0006), issued on August 20, 2001.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
2 Degassing Operations	2.02	2.02	0.71	Less than 13.0	24.31	4.47	Less than 10 for total HAPs
4 General Cleaning Operations	-	-	-		-	-	
1 Dig-out Operation (Insignificant)	0.28	0.14	-	-	-	-	-
Boiler B01 (Insignificant)	0.23	0.23	0.02	0.17	2.58	3.07	Negligible
Total PTE of this Modification	2.53	2.39	0.73	13.2	26.9	7.54	Less than 10 for total HAPs
* The PTE of the Existing Source	90.3	90.3	5.00	Less than 250	5.00	5.00	61.2 for total HAPs

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
The total PTE of the Entire Source After this Modification	92.8	92.8	5.73	**Less than 250	31.9	12.5	Less than 71.2 for total HAPs
PSD Significant Thresholds	250	250	250	250	250	250	NA

Note: (*)The PTE of the existing units are from the Technical Support Document (TSD) for the source's Title V permit (#027-7223-00006), issued on August 20, 2001.
(**)The source proposed to limit the VOC emissions from the entire source to less than 250 tons/yr after this modification.

This modification to an existing minor stationary source is not major because the existing source is a PSD minor source and the potential to emit of each criteria pollutant from the proposed cleaning facility is less than the PSD significant thresholds of 250 tons/yr. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

The source proposed to limit the VOC emissions from the entire source to less than 250 tons/yr after this modification. Therefore, the source will still maintain the PSD minor source status.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

(b) The wash water and process water tanks have capacities less than 40 cubic meters (10,560 gallons) and the VOC content in the waste water is negligible. Therefore, the New Source Performance Standards for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984 (40 CFR 60.110b - 117b, Subpart Kb) are not applicable to these tanks.

(c) Boiler BO-01 has a maximum heat input less than 10 MMBtu/hr. Therefore, the New Source Performance Standards for Small Industrial - Commercial - Institutional Steam generating Units (40 CFR 60.40c-48c, Subpart Dc) are not applicable.

(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

(e) This Part 70 Permit does involve pollutant-specific emissions units (Degassing Operations and Cleaning Operations) as defined in 40 CFR 64.1 for VOC and HAPs:

(1) with the potential to emit before controls equal to or greater than the major source threshold for VOC and HAPs;

(2) that is subject to an emission limitation or standard for VOC and HAPs; and

(3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the proposed degassing and cleaning operations are subject to the requirements of 40 CFR 64 (Compliance Assurance Monitoring). However, since the VOC and HAP emissions after control from these units are less than the Title V major source thresholds, the compliance assurance monitoring requirements will be addressed in the source's first Part 70 renewal permit.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source was constructed in 1986 and modified in 1991 and 2003 (this modification). This source is not in 1 of the 28 source categories defined in 326 IAC 2-2-1(p)(1). The potential to emit PM, PM10, VOC before control was greater than two hundred and fifty (250) tons per year. The PM, PM10 and VOC emissions for the entire source were limited to less than 250 tons/yr in the source's Title V permit (T027-7723-00006, issued on August 20, 2001).

The potential to emit VOC from this modification is greater than 250 tons/yr before control. In order to be a PSD minor modification, the source has proposed the following limitations:

(a) The Permittee shall direct the exhausts from the railcars which have high VOC containing commodities (vapor pressure greater than 0.5 psi) to one of the following control devices.

(1) Flare FL-01 for the degassing operations (DG-01 and DG-02), for the flammable VOC commodities, which have flashpoints less than 140EF.

(2) Carbon adsorption system CC-01 for the cleaning spots (CL-01, CL-02, CL-03, and CL-04), for the non-flammable VOC commodities with vapor pressure greater than 0.5 psi.

(b) The railcar cleaning operations at the railcar cleaning facility shall be limited such that the total VOC emissions are to less than 13.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The monthly VOC emissions shall be determined by the following equation:

VOC Emissions

$$= \sum_{n} \{a \times \frac{P \times V \times MW}{R \times T} + b \times [CF \times S + RE] \times D\} \times (1 - Eff)$$

Where,

n = number of VOC containing railcars in cleaned each month in each category
a = 1 for P equal or less than 14.7 psi (1 atm)
0.05 for P greater than 14.7 psi
P = vapor pressure of the commodity in each railcar shown on MSDS (psi)
V = volume of each railcar (ft^3) (1 gallon = 0.1337 ft^3)
MW = molecular weight of each commodity
R = gas constant = 10.73 psi·ft^3/lb-mole·^oR
T = the temperature for the vapor pressure specified on MSDS (^oR)
b = 0 for P equal or less than 14.7 psi
1 for P greater than 14.7 psi
CF = clingage factor = 0.000315 gallons/ft^2 from AP-42
S = the inner surface area of the railcar (ft^2)
RE = residuals in the railcar = 5 gallons
D = liquid density (lb/gal)
Eff = control efficiency (%)

[note: This equation is provided by the source based on the automatic tracking system at this source.]

In addition, this source would like to limit the VOC emissions from the entire source to less than 250 tons/yr in order to maintain the PSD minor source status. Therefore, the VOC usage limit from the existing paint facility will be adjusted from less than 249 tons/yr to less than 236 tons/yr. Combined with the VOC emissions from the proposed railcar cleaning facility, the VOC emissions from the entire source are limited to less than 250 tons/yr. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable. The source will still maintain the PSD minor source status after this modification.

326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)

This source was constructed in 1986 and modified in 1991 and 2003 (this modification). This modification will be constructed after July 27, 1997, and the potential to emit HAPs before control from this modification is greater than 10 tons/yr for a single HAP and greater than 25 tons/yr for any combination of HAPs. The source has proposed the following emission limitations:

(a) The Permittee shall direct the exhausts from the railcars which have high VOC containing commodities (vapor pressure greater than 0.5 psi) to one of the following control devices.

(1) Flare FL-01 for the degassing operations (DG-01 and DG-02), for the flammable VOC commodities, which have flashpoints less than 140EF.

(2) Carbon adsorption system CC-01 for the cleaning spots (CL-01, CL-02, CL-03, and CL-04), for the non-flammable VOC commodities with vapor pressure greater than 0.5 psi.

(b) The railcar cleaning operations at the railcar cleaning facility shall be limited such that the total HAP emissions are to less than 10.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The monthly HAP emissions shall be determined by the following equation:

HAP Emissions

$$= \sum_{n} \{a \times \frac{P \times V \times MW}{R \times T} + b \times [CF \times S + RE] \times D\} \times (1 - Eff)$$

Where,

n = number of HAP containing railcars in cleaned each month in each category
a = 1 for P equal or less than 14.7 psi (1 atm)
0.05 for P greater than 14.7 psi
P = vapor pressure of the commodity in each railcar shown on MSDS (psi)
V = volume of each railcar (ft^3) (1 gallon = 0.1337 ft^3)
MW = molecular weight of each commodity
R = gas constant = 10.73 psi·ft^3/lb-mole·^oR
T = the temperature for the vapor pressure specified on MSDS (^oR)
b = 0 for P equal or less than 14.7 psi
1 for P greater than 14.7 psi
CF = clingage factor = 0.000315 gallons/ft^2 from AP-42
S = the inner surface area of the railcar (ft^2)
RE = residuals in the railcar = 5 gallons
D = liquid density (lb/gal)
Eff = control efficiency (%)

[note: This equation is provided by the source based on the automatic tracking system at this source.]

Therefore, the requirements of 326 IAC 2-4.1 (MACT) are not applicable to this modification.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit VOC more than one hundred (100) tons per year. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity for sources located in Lake County shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - **Degassing Operations (DG-01 and DG-02) and General Cleaning Spots (CL-01, CL-02, CL-03, and CL-04)**

326 IAC 8-1-6 (New Facilities - General Reduction Requirement)

The total VOC emissions from the proposed railcar cleaning facility are greater than 25 tons/yr. Therefore, the proposed railcar cleaning process at this source is subject to 326 IAC 8-1-6, and the Best Available Control Technology (BACT) is required for the this process. IDEM, OAQ has agreed that the following control operations are the BACT for the railcar cleaning process:

(a) Flare FL-01 for the degassing operations (DG-01 and DG-02), for the flammable VOC commodities, which have flashpoints less than 140EF.

(b) Carbon adsorption system CC-01 for the cleaning spots (CL-01, CL-02, CL-03, and CL-04), for the non-flammable VOC commodities with vapor pressure greater than 0.5 psi.

With the control devices above, the VOC emissions from the entire railcar cleaning facility will be limited to less than 25 tons/yr.

326 IAC 9-1-2 (Carbon Monoxide Emission Requirements)

This source is not among the listed source categories in 326 IAC 9-1-2. Therefore, the requirements of 326 IAC 9-1-2 are not applicable the flare FL-01.

326 IAC 10-1-3 (Nitrogen Oxide Emission Requirements)

This source is not located in Clark or Floyd County. Therefore, the requirements of 326 IAC 10-1-3 are not applicable to flare FL-01.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The proposed water tanks contain negligible VOC and this source is not located in Clark, Floyd, Lake, or Porter County. Therefore, the requirements of 326 IAC 8-9-1 are not applicable to these tanks.

State Rule Applicability - Insignificant Activities

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The allowable particulate emissions from the dig-out operation (DO-01) shall be limited to 7.58 lbs/hr when the process weight rate is 5,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

According to the emission calculations (see Appendix A), the potential to emit PM from the dig-out operation (DO-01) is less than the particulate limit above. Therefore, the dig-out operation is in compliance with 326 IAC 6-3-2.

326 IAC 6-2-4 (PM Emissions for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4(a), indirect heating facilities constructed after September 12, 1983, shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where Pt = emission rate limit (lbs/MMBtu)
Q = total source heat input capacity (MMBtu/hr)

The proposed boiler BO-01 has a maximum heat input capacity of 7.0 MMBtu/hr and there are two existing 8.76 MMBtu/hr boilers. The emission rate limit calculated from the equation above equals:

$$Pt = \frac{1.09}{(2 \times 8.76 + 7.0)^{0.26}} = 0.47 \text{ lbs/MMBtu}$$

Therefore, the PM emission limit for boiler BO-01 is 0.47 lbs/MMBtu.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

1. The degassing operations (DG-01 and DG-02) have applicable compliance monitoring conditions as specified below:

   (a) Visible emissions notations of the stack exhaust of flare FL-01 shall be performed once per shift during normal daylight operations when flare FL-01 is in operation. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

   (b) The presence of a flare flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame.

   These monitoring conditions are necessary because flare FL-01 must operate properly at all times the degassing operations (DG-01 and DG-02) are in operation to ensure compliance with 326 IAC 2-2 (PSD), 326 IAC 2-4.1 (MACT), and 326 IAC 8-1-6 (BACT).

2. The general cleaning spots (CL-01, CL-02, CL-03, and CL-04) have applicable compliance monitoring conditions as specified below:

   (a) The Permittee shall monitor the VOC breakthrough indicator of the carbon adsorption system (CC-01), at least once per shift when the carbon adsorption system is in operation. The Permittee shall replace the spent carbon canister as indicated.

   (b) An inspection shall be performed each calendar quarter for the carbon adsorption system (CC-01) controlling the general cleaning spots (CL-01, CL-02, CL-03 and CL-04). Inspections required by this condition shall not be performed in consecutive months. Inspections are optional when venting to the indoors. In the event that the carbon adsorption system malfunction has been observed, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

   (c) The Permittee shall monitor and record the pH level of the scrubbing system SC-01, at least once per shift when the scrubbing system is in operation. When for any one reading, the pH level is outside the normal pH level range of 4.0 and 10.0, or a pH level established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Implementation, Preparation, Records, and Reports.

   [Note: This scrubbing system is not a typical scrubber and consists of the wash tanks and the orbital wash system, which sprays water droplets throughout the inside of the railcars. Therefore, there is no corresponding pressure drop or flow rate monitoring requirements with this scrubbing system.]

These monitoring conditions are necessary because carbon adsorption system CC-01 and scrubbing system SC-01 must operate properly at all times the general cleaning spots (CL-01, CL-02, CL-03, and CL-04) are in operation to ensure compliance with 326 IAC 2-2 (PSD), 326 IAC 2-4.1 (MACT), and 326 IAC 8-1-6 (BACT).

Proposed Changes

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary railcar manufacturing and maintenance facility.

Responsible Official:	~~David Hirschey,~~ Director, Safety & Environmental
Source Address:	1723 West Walnut Street, Washington, ~~IN~~ **Indiana** 47501
Mailing Address:	1723 West Walnut Street, Washington, ~~IN~~ **Indiana** 47501
General Source Phone Number:	(812) 254-1121
SIC Code:	4789
County Location:	Daviess
Source Location ~~County~~ Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act **Not 1 of 28 Source Categories**

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This railcar manufacturing and maintenance company consists of ~~two (2)~~ **three (3)** plants:

(a) Plant 1, the abrasive blasting building, is located at 1723 West Walnut Street, Washington, ~~IN~~**Indiana**; and

(b) Plant 2, the paint and stencil building, is located at 1723 West Walnut Street, Washington, ~~IN~~**Indiana**.

(c) Plant 3, the railcar cleaning building, is located at 1723 West Walnut Street, Washington, Indiana.

Since the ~~two (2)~~ **three (3)** plants are located on contiguous properties, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this Part 70 permit In this case, the word plant refers to separate buildings located at the same address.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(d) One (1) railcar cleaning facility, constructed in 2003 and located at Plant 3, consisting of the following:

(1) Two (2) degassing operations, identified as DG-01 and DG-02, used to remove the flammable commodities in the railcars, each with a maximum process rate of 2 railcars per day, controlled by a 15 MMBtu/hr natural gas-piloted flare (FL-01), and exhausting through stack FL-01.

(2) Four (4) general cleaning spots, identified as CL-01, CL-02, CL-03, and CL-04, with a total maximum process rate of 10 railcars per day, exhausting through vent CV-01. The emissions may be controlled by one of the following control devices:

(A) For VOC containing commodities, controlled by one (1) carbon adsorption system, identified as CC-01, exhausting through stack CC-01.

(B) For water soluble commodities, controlled by one (1) enclosed scrubbing system, identified as SC-01. The scrubbing water is directed to one (1) enclosed loop cleaning system, which consists of two (2) 4,000 gallon water tanks and is controlled by adsorption system CC-01.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour~~,~~ **[**326 IAC 6-2-~~3~~**4]:**~~.~~

(1) Two (2) natural gas fired boilers, constructed after 1983, each with a maximum heat input capacity of 8.76 MMBtu/hr.

(2) One (1) natural gas fired boiler, identified as BO-01 and constructed in 2003, with a maximum heat input capacity of 7.0 MMBtu/hr, providing steam to cleaning operation and drying operation, and exhausting through stack BO-01.

. . . . . .

(d) Other emission units, not regulated by a NESHAP, with PM10 and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

(1) One (1) dig-out operation, identified as DO-01, used to remove the solid material in the railcars, with a maximum process rate of 5,000 pounds of material per hour, exhausting through vent CV-02. [326 IAC 6-3-2]

D.2.1 Volatile Organic Compounds (VOC)Limitations

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of **a daily volume - weighted average of** 3.5 pounds of VOC per gallon of coating excluding water or 4.3 pounds of VOC per gallon of clear coating excluding water, as delivered to the applicator for any calender day for air dried or forced warm air (less than 90EC or 194 EF) dried coatings.

D.2.2 PSD Minor Limit [326 IAC 2-2] ~~[40 CFR 52.21]~~

This facility shall use less than ~~249~~ **236** tons of VOC, including coatings, dilution solvents, and cleaning solvents, per **twelve (**12**)** consecutive month period **with compliance determined at the end of each month**. This usage**, when combined with Condition D 5.2,** limit is required to limit the potential to emit of VOC to less than 249 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration)~~ and 40 CFR 52.21~~ not applicable.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)];

(~~a~~**c**) A welding operation consisting of one (1) submerged arc station with a maximum hourly consumption of sixty (60) pounds of wire; twenty-two (22) metal inert gas stations with a maximum hourly consumption of fifty (50) pounds of wire per station; forty-eight (48) stick welding stations with a maximum hourly capacity of seventy-five (75), one ounce electrodes per station; and forty-eight oxymethane flame-cutting stations with a maximum metal cutting rate of twenty (20) inches per minute~~.; and~~

Insignificant Activities:

(~~b~~**c**) A sand storage silo constructed in 1985 with a maximum capacity of 55 tons of sand and a maximum throughput of 15,685 tons of sand per year with a filter bag as emission control.

(d) Other emission units, not regulated by a NESHAP, with PM10 and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

(1) One (1) dig-out operation, identified as DO-01, used to remove the solid material in the railcars, with a maximum process rate of 5,000 pounds of material per hour, exhausting through vent CV-02. [326 IAC 6-3-2]

(The information describing the process contained in this facility description box is descriptive and does not constitute enforceable conditions.)

D.3.1 Particulate ~~Matter (PM)~~ [326 IAC 6-3]

(a) ~~The PM~~ **Particulate Emissions** from the welding operations shall not exceed the pound per hour emission rate established as E in the following formula, for a process weight rate equal to or greater than 100 pounds per hour:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3 (Process Operations), ~~the allowable PM~~ **particulate** emission**s** ~~rate~~ from the sand storage silo shall not exceed 3.0 pounds per hour when operating at a process weight rate of 1,250 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(c) Pursuant to 326 IAC 6-3-2 (Manufacturing Processes), particulate emissions from the dig-out operation (DO-01) shall not exceed 7.58 pounds per hour when operating at a process weight rate of 5,000 pounds per hour. This emission limit is calculated using the equation in (a) above.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Insignificant Activities:

~~Two (2) Natural Gas-fired Boilers less than 10 MMBtu/hr each.~~

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour~~,~~ **[**326 IAC 6-2-~~3~~**4]:**~~:~~

(1) Two (2) natural gas fired boilers, constructed after 1983, each with a maximum heat input capacity of 8.76 MMBtu/hr.

(2) One (1) natural gas fired boiler, identified as BO-01 and constructed in 2003, with a maximum heat input capacity of 7.0 MMBtu/hr, providing steam to cleaning operation and drying operation, and exhausting through stack BO-01.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) **[326 IAC 6-2-4]**

(a) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating**),** the PM emissions from the two (2) **8.76** ~~less than (10)~~ MMBtu per hour heat input boiler**s** shall be limited to 0.62 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = emission rate limit (lbs/MMBtu)
Q = total source heat input capacity (MMBtu/hr)

(b) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the boiler BO-01 shall be limited to 0.47 pounds per MMBtu heat input.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(d) One (1) railcar cleaning facility, constructed in 2003 and located at Plant 3, consisting of the following:

(1) Two (2) degassing operations, identified as DG-01 and DG-02, used to remove the flammable commodities in the railcars, each with a maximum process rate of 2 railcars per day, controlled by a 15 MMBtu/hr natural gas-piloted flare (FL-01), and exhausting through stack FL-01.

(2) Four (4) general cleaning spots, identified as CL-01, CL-02, CL-03, and CL-04, with a total maximum process rate of 10 railcars per day, exhausting through vent CV-01. The emissions may be controlled by one of the following control devices:

(A) For VOC containing commodities, controlled by one (1) carbon adsorption system, identified as CC-01, exhausting through stack CC-01.

(B) For water soluble commodities, controlled by one (1) enclosed scrubbing system, identified as SC-01. The scrubbing water is directed to one (1) enclosed loop cleaning system, which consists of two (2) 4,000 gallon water tanks and is controlled by adsorption system CC-01.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 VOC Emissions [326 IAC 8-1-6] [326 IAC 2-2]

(a) Pursuant to 326 IAC 8-1-6 (BACT), the Permittee shall direct the exhausts from the railcars which have high VOC containing commodities (vapor pressure greater than 0.5 psi) to one of the following control devices.

(1) Flare FL-01 for the degassing operations (DG-01 and DG-02), for the flammable VOC commodities, which have flashpoints less than 140EF.

(2) Carbon adsorption system CC-01 for the cleaning spots (CL-01, CL-02, CL-03, and CL-04), for the non-flammable VOC commodities with vapor pressure greater than 0.5 psi.

(b) The railcar cleaning operations at the railcar cleaning facility shall be limited such that the total VOC emissions are less than 13.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The monthly VOC emissions shall be determined by the following equation:

VOC Emissions

$$= \sum_{n} \{a \times \frac{P \times V \times MW}{R \times T} + b \times [CF \times S + RE] \times D\} \times (1 - Eff)$$

Where,

n = number of VOC containing railcars in cleaned each month in each category
a = 1 for P equal or less than 14.7 psi (1 atm)
0.05 for P greater than 14.7 psi
P = vapor pressure of the commodity in each railcar shown on MSDS (psi)
V = volume of each railcar (ft^3) (1 gallon = 0.1337 ft^3)
MW = molecular weight of each commodity
R = gas constant = 10.73 psi·ft^3/lb-mole·°R
T = the temperature for the vapor pressure specified on MSDS (°R)
b = 0 for P equal or less than 14.7 psi
1 for P greater than 14.7 psi
CF = clingage factor = 0.000315 gallons/ft^2 from AP-42
S = the inner surface area of the railcar (ft^2)
RE = residuals in the railcar = 5 gallons
D = liquid density (lb/gal)
Eff = control efficiency (%)

[note: This equation is provided by the source based on the automatic tracking system at this source.]

Combined with limits in the rest of the permit, these requirements ensure that VOC emissions from the entire source are limited to less than 250 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

D.5.2 HAP Emissions [326 IAC 2-4.1]

(a) The Permittee shall direct the exhausts from the railcars which have HAP containing commodities to one of the following control devices.

(1) Flare FL-01 for the degassing operations (DG-01 and DG-02), for the flammable commodities, which have flashpoints less than 140EF.

(2) Carbon adsorption system CC-01 for the cleaning spots (CL-01, CL-02, CL-03, and CL-04), for the non-flammable HAP commodities with vapor pressure greater than 0.5 psi.

(3) Scrubbing system SC-01 for the cleaning spots (CL-01, CL-02, CL-03, and CL-04), for the water soluble HAP commodities.

(b) The railcar cleaning operations at the railcar cleaning facility shall be limited such that total HAP emissions are less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The monthly total HAP emissions shall be determined by the equation in Condition D.5.1(b).

The requirements above ensure that HAPs emissions from the this railcar cleaning facility is less than 10 tons/yr for a single HAP and less than 25 tons/yr for any combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 (MACT) are not applicable.

D.5.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.5.4 VOC and HAPs Emissions

In order to demonstrate compliance with Condition D.5.1(a) and D.5.2(a), for each railcar serviced, the Permittee shall keep the material safety data sheets (MSDS) for each commodity, and identify where each railcar was cleaned and how emissions from the cleaning operation were controlled.

D.5.5 VOC and HAPs Emission Control

In order to comply with Conditions D.5.1(a) and D.5.3(a), the Permittee shall install, calibrate, maintain, and operate a heat sensing device, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.6 Visible Emissions Notations

(a) Visible emission notations of stack exhaust from flare FL-01 shall be performed once per shift during normal daylight operations when this unit is in operation. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.5.7 Flare Pilot Flame

In order to comply with Condition D.5.5, the Permittee shall monitor the presence of a flare pilot flame using a thermocouple or any other equivalent device to detect the presence of a flame when the degassing operations (DG-01 and DG-02) are in operation.

D.5.8 Carbon Adsorption System

The Permittee shall monitor the VOC breakthrough indicator of the carbon adsorption system (CC-01), at least once per shift when the carbon adsorption system is in operation. The Permittee shall replace the spent carbon canister as indicated.

D.5.9 Carbon Adsorption System Inspections

An inspection shall be performed each calendar quarter for the carbon adsorption system (CC-01) controlling the general cleaning spots (CL-01, CL-02, CL-03 and CL-04). Inspections required by this condition shall not be performed in consecutive months. Inspections are optional when venting to the indoors.

D.5.10 Failure Detection

In the event that the carbon adsorption system malfunction has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.

D.5.11 Scrubbing System Monitoring

The Permittee shall record the pH level of the scrubbing system (SC-01) at least once per shift when the scrubbing system is in operation. When for any one reading, the pH level is outside the normal range of pH value of 4.0 to 10.0, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pH value reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The pH level shall be determined with the use of disposable pH paper.

[Note: This scrubbing system is not a typical scrubber and consists of the wash tanks and the orbital wash system, which sprays water droplets throughout the inside of the railcars. Therefore, there is no corresponding pressure drop or flow rate monitoring requirements with this scrubbing system.]

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.12 Record Keeping Requirements

(a) To document compliance with Conditions D.5.1(a), D.5.2(a), and D.5.4, the Permittee shall maintain records of the following for each railcar serviced:

(1) The material safety data sheets (MSDS) for each commodity.

(2) The cleaning operations of each railcar processed and how emissions were controlled in these cleaning operations.

(b) To document compliance with Conditions D.5.1(b) and D.5.2(b), the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP emission limits established in conditions D.5.1(b) and D.5.2(b).

(1) The commodity of each railcar cleaned.

(2) The vapor pressure of each commodity.

(3) The volume of each railcar cleaned.

(4) The molecular weight of each commodity.

(5) The inner surface area of the railcar, for commodites with a vapor pressure greater than 14.7 psi.

(6) The density of the commodity, for commodites with a vapor pressure greater than 14.7 psi.

(7) The total VOC and HAP emissions for each month.

(8) The total VOC anc HAP emissions for each compliance period.

(c) To document compliance with Condition 5.6, the Permittee shall maintain the once per shift records of visible emission notation of the exhaust from flare FL-01, when flare FL-01 is in operation.

(d) To document compliance with Condition 5.8, the Permittee shall maintain the once per shift records of VOC breakthrough monitor for carbon adsorption system CC-01 and the records of the spent carbon canister replacement when the carbon adsorption system is in operation.

(e) To document compliance with Condition 5.9, the Permittee shall maintain records of the results of the inspections required under Condition D.5.9.

(f) To document compliance with Condition 5.11, the Permittee shall maintain the once per shift records of pH level for scrubbing system SC-01 when the scrubbing system is in operation.

(g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.5.1(b) and D.5.2(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Rescar Industries
Source Address: 1723 West Walnut Street, Washington, ~~IN~~ **Indiana** 47501
Mailing Address: 1723 West Walnut Street, Washington, ~~IN~~ **Indiana** 47501
Part 70 Permit No.: T027-7723-00006
Facility: Paint Facility
Parameter: VOC **Usage**
Limit: Input VOC usage less than ~~250~~ **236** tons per 12 consecutive month period **with compliance determined at the end of each month**.

YEAR: _____

Month	VOC Usage (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Source Modification Quarterly Report

Source Name: **Rescar Industries**
Source Address: **1723 West Walnut Street, Washington, Indiana 47501**
Mailing Address: **1723 West Walnut Street, Washington, Indiana 47501**
Source Modification No.: **027-16864-00006**
Facility: **Railcar Cleaning Facility**
Parameter: **VOC Emissions**
Limit: **Less than 13 tons per twelve (12) month period with compliance determined at the end of each month. VOC emissions are determined using the equation in Condition D.5.1(b).**

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 **No deviation occurred in this quarter.**

9 **Deviation/s occurred in this quarter.**
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Source Modification Quarterly Report

Source Name: **Rescar Industries**
Source Address: **1723 West Walnut Street, Washington, Indiana 47501**
Mailing Address: **1723 West Walnut Street, Washington, Indiana 47501**
Source Modification No.: **027-16864-00006**
Facility: **Railcar Cleaning Facility**
Parameter: **Total HAP Emissions**
Limit: **Less than 10 tons per twelve (12) month period with compliance determined at the end of each month. HAP emissions are determined using the equation in Condition D.5.1(b).**

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 **No deviation occurred in this quarter.**

9 **Deviation/s occurred in this quarter.**
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Conclusion

The construction of this proposed modification shall be subject to the conditions of the proposed Part 70 Significant Source Modification No. 027-16864-00006. The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 027-17130-00006.

Appendix A: Emission Calculations
VOC and HAP Emissions
From Two (2) Degassing Operations (DG-01 and DG-02) and Four (4) Cleaning Operations (CL1-CL4)

Company Name: Rescar Industries, Inc.
Address: 1723 West Walnut Street, Washington, IN 47501
SPM#: 027-17130-00006
Reviewer: ERG/YC
Date: June 27, 2003

The railcars which contain VOC or HAP commodities could be processed in the degassing operations, which are controlled by a flare with 98% control efficiency, or be processed in the cleaning operations, which are controlled by a carbon adsorption system with 99.75% efficiency.

Worst case scenario: assume that all the VOC and HAP containing railcars are processed in the degassing operations only.

Railcar Commodity Example	Vapor Pressure at 75F (psi)	Molecular Weight (lbs/lb-mole)	Size of Railcar (gal/car)	Maximum Process Rate (car/day)	Potential VOC (lbs/car)	Potential to Emit VOC (tons/yr)	Flare Control Efficiency (%)	Potential to Emit VOC after Control (ton/yr)
**Methylene Chloride (HAP)	7.94	84.94	34,000	4.0	534.1	389.86	98%	7.80
1,1-Dichloroethylene (VOC)	11.17	96.50	34,000	4.0	853.6	623.10	98%	12.46
Gasoline (VOC)	6.80	66.00	34,000	4.0	355.4	259.44	98%	5.19
***Total**						**623.10**		**12.46**

* The total VOC emissions are the highest emissions among the different commodities.

** The railcars processed at this site could contain any federal HAP. Methylene Chloride is the worst case scenario.

METHODOLOGY

Potential VOC (lbs/car) = VP (psi) x Size of Railcar (gal/car) x 0.1337 ft^3/gal x Molecular Weight (lbs/lbs-mole) / Gas Constant (10.73 psi-ft^3/lbs-mode-R) / Temp (75F+460)

Potential to Emit VOC (tons/yr) = Potential VOC (lbs/car) x Max. Process Rate (cars/day) x 365 days/yr x 1 ton/2000 lbs

Potential to Emit VOC after Control (tons/yr) = Potential to Emit VOC (tons/yr) x (1-Control Efficiency)

Appendix A: Emission Calculations
Natural Gas Combustion

From Two (2) Degassing Operations (DG-01 and DG-02)

Company Name: Rescar Industries, Inc.
Address: 1723 West Walnut Street, Washington, IN 47501
SPM#: 027-17130-00006
Reviewer: ERG/YC
Date: June 27, 2003

* The degassing operations are controlled by one (1) 15MMBtu/hr natural gas-fired flare.

Max. Heat Input MMBtu/hr	Flow Rate scfm
15.0	695

	Pollutant				
	PM[a]	PM10[a]	SO_2[c]	NOx[b]	CO[b]
Emission Factor	177.0 (ug/dsl)	177.0 (ug/dsl)	NA	0.068 (lbs/MMBtu)	0.37 (lbs/MMBtu)
Potential Emission in tons/yr	**2.02**	**2.02**	**0.71**	**4.47**	**24.31**

[a] Emission Factors are from AP-42, Chapter 13.5 - Industrial Flares -Table 13.5-1 - Soot for average smoking flares (AP-42, 01/95). Assuming PM10 emissions equal PM emissions.

[b] Emission Factors are from AP-42, Chapter 13.5 - Industrial Flares, Table 13.5-1 (AP-42, 01/95)

[c] Assuming all the SO_2 emissions are from the railcars containing sulfur acid and all the sulfur contained converts to SO_2 after flare combustion.

Methodology

PM/PM10 Emissions (tons/yr) = Flow Rate (scfm) x 60 (min/hr) x 28.317 (l/scf) x Emission Factor (ug/dsl) x 1g/1000000 ug x 1 lbs/454 g x 8760 (hr/yr) x 1 ton/2000 lbs

SO_2 Emissions (tons/yr) = 0.193 psi x 34,000 gal/car x 0.1337 cf/gal x Mole weight of SO_2 (64 lbs/lbs mole) / Gas Constant (10.73 psi-cf/lb mole-R) / Temp (75F+ 460) x 4 cars/day x 365 cars/yr x 1 ton/2000 lbs

NOx/CO Emissions (tons/yr) = Max. Heat Input (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
Natural Gas Combustion
(MMBtu/hr < 100)
From Boiler BO1 (Insignificant)

Company Name: Rescar Industries, Inc.
Address: 1723 West Walnut Street, Washington, IN 47501
SPM#: 027-17130-00006
Reviewer: ERG/YC
Date: June 27, 2003

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
7.0	61.3

	Pollutant					
	PM*	PM10*	SO_2	**NO_x	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100	5.5	84.0
Potential Emission in tons/yr	**0.23**	**0.23**	**1.8E-02**	**3.07**	**0.17**	**2.58**

*PM and PM10 emission factors are condensable and filterable PM10 combined.
**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

Methodology

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)
Potential Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emission Calculations
PM/PM10 Emissions

From the Dig-out Operation DO-01 (Insignificant)

Company Name: Rescar Industries, Inc.
Address: 1723 West Walnut Street, Washington, IN 47501
SPM#: 027-17130-00006
Reviewer: ERG/YC
Date: June 27, 2003

Max. Process Rate
lbs/hr

5,000 (Provide by the source)

	Pollutant	
	PM	PM10
*Emission Factor (lbs/ton)	0.026	0.013
Potential to Emit in lbs/hr	**0.065**	**0.0325**
Potential to Emit in tons/yr	**0.28**	**0.14**

* There are no emission factors available for railcar dig-out operation. The emission factors used here are from AP-42, Chapter 12.5, Table 12.5-4 for batch drop operation of high silt slag at iron and steel mills(10/86).

Methodology

PTE of PM/PM10 (lbs/hr) = Max. Process Rate (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton)
PTE of PM/PM10 (tons/yr) = Max. Process Rate (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton) x 8760 hrs/yr x 1 ton/2000 lbs